

Exhibit R

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF EUGENIA S. SINGER

I, EUGENIA S. SINGER, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the World Trade Center Towers when the terrorist attacks occurred.

4. I was employed by AON, a worldwide insurance brokerage and risk-management consulting company. Our offices were on the 103rd floor of Tower 2 at the World Trade Center in New York City.

5. I was in Tower 2, on the 103rd floor of the World Trade Center, New York City when the first plane hit Tower 1. All of us in the office were told to leave the building after the

first plane hit. I had made it down to the 78th floor with some other co-workers, and was in the sky lobby area, waiting to exit when the second plane crashed into Tower 2. I was thrown across the sky lobby floor, and sustained physical injuries when part of the United Airlines plane landed just a few feet away from me. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists, and my life was altered forever.

6. My experience on September 11, 2001, as a result of this act of terrorism is as follows: I suffered a compound, open fracture of the distal radius and ulna near my left wrist. I suffered third degree burns which covered my left and right arms, hands and fingers. The burns required two skin graft surgeries. I suffered a concussion, and contusions and lacerations on my head that required multiple cauterization treatments. My left shoulder was fractured, as were my left clavicle and left scapula. The fourth, fifth and sixth ribs on my left side were also fractured. I have experienced a lengthy and difficult recuperation which continues to this day. I had a metal plate and four pins inserted in my left wrist area to hold my hand together. The plate and pins were eventually removed so my range of motion, which was very limited, could be increased. I had endured skin graft surgery and have had severe scarring with hypersensitivity to my arms. While the medical documentation concerning my injuries is extensive, attached as Exhibit B are a few of the medical reports substantiating my injuries.

7. I suffered from and continue to suffer from Post Traumatic Stress Disorder, and I have received treatment for same due to the gruesome and terrible experience I endured that day. I saw colleagues and friends of mine, including my supervisor, killed or maimed. I saw and heard co-workers who had died; and witnessed countless injured persons screaming for help, who could

not walk and had to be left where they had fallen, unable to move due to debris or broken bones. I have experienced anxiety and loss of enjoyment of life, among other issues. I have also suffered from chronic fatigue, excessive weight loss, nausea, dizziness, and abnormal blood tests results from the four surgical procedures and blood transfusion I received.

8. I was taken by medics to St. Vincent's Hospital in New York City for medical attention for my injuries. I was in the hospital for three weeks and had a further convalescence at my parents' home in New Jersey, as I could not attend to the daily activities of living. I had further surgeries after that, to assist in my recovery.

9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

10. I previously pursued a claim (Claim Number VCF 212-003536) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation. A copy of the Amended Eligibility decision is attached as Exhibit C.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 3rd day of January, 2020.



Signature of Declarant Eugenia Singer

Exhibits Filed Under Seal